

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 HSBC BANK USA, N.A.,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-01300-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS
AND OPPOSE COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF Nos. 19, 40)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company ("Chicago Title") and plaintiff HSBC Bank USA, National Association ("HSBC"), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On July 8, 2021 HSBC filed its complaint in the Eighth Judicial District Court for the State of Nevada;

2. On July 8, 2021, Chicago Title removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. On September 10, 2021 Chicago Title moved to dismiss HSBC's complaint (ECF No. 19);

4. On November 19, 2021 HSBC opposed Chicago Title's motion to dismiss (ECF No. 39) and filed a countermotion for partial summary judgment (ECF No. 40);

5. Counsel for Chicago Title requests a 31-day extension to oppose the countermotion for partial summary judgment and a 52-day extension to reply in support of its motion to dismiss, such that Chicago Title's reply and opposition are due on January 10, 2022, to afford Defendants' counsel additional time to review and respond to HSBC's opposition and countermotion.

6. Counsel for HSBC does not oppose the requested extension;

7. This is the first request for an extension made by counsel for Defendants, which is made in good faith and not for the purposes of delay.

8. This stipulation is entered into without waiving any of Defendants' objections under Fed. R. Civ. P. 12.

//

//

//

//

//

//

//

//

//

//

//

//

//

1 **IT IS SO STIPULATED** that Chicago Title's reply in support of its motion to dismiss
2 and opposition to HSBC's countermotion is hereby extended through and including Monday,
3 January 10, 2022.

4 Dated: November 22, 2021

SINCLAIR BRAUN LLP

6 By: /s/-Kevin S. Sinclair
7 KEVIN S. SINCLAIR
8 Attorneys for Defendants
CHICAGO TITLE INSURANCE COMPANY

9 Dated: November 22, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon
12 LINDSAY D. DRAGON
13 Attorneys for Plaintiff
HSBC BANK USA, NATIONAL
ASSOCIATION

14 **IT IS SO ORDERED.**

15 Dated this 23rd day of November, 2021.

16 
17 ANDREW P. GORDON
18 UNITED STATES DISTRICT JUDGE
19
20
21
22
23
24
25
26
27
28